

000005335

Attachment 1  
GLP-022-93  
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## ROCKY FLATS PLANT ENFORCEABLE MILESTONES STATUS

**Agreement Milestone:** Submit R&D Permit Application for LLM B374/774 and Solvent Waste Thermal Treatment.

**Due Date:** 5/31/93

**Driver:** Comprehensive Treatment and Management Plan Developed under RCRA Mixed Waste Compliance Agreement with EPA

**Reason for potential delay:**

This milestone is to be met by the preparation of an R&D permit for the in-situ testing of acid gas neutralization generated from burning surrogate waste plastics in a Fluidized Bed Unit (FBU) owned by the Energy and Environmental Research (EER) Company in California. EER is a subcontractor to the Environmental Protection Agency Risk Reduction Engineering Laboratory (EPA/RREL) which is in turn in the process of entering into a formal Interagency Agreement (IAG) with the Department of Energy (DOE) to do the work to complete this milestone. Comparable facilities are not available at the Rocky Flats Plant to perform this work. EPA/RREL has postponed execution of the IAG until the new EPA administration is in place, and has thus suspended funding available to EER to proceed with their work, including preparation of the aforementioned permit.

**Have the regulators been advised:**

It is currently planned to informally apprise the regulators of the situation surrounding this milestone in the next monthly LDR FFCA Program Manager's Meeting. No formal notification is yet planned as the risk of not meeting this milestone is presently low.

**Actions taken to address delays:**

1. DOE has advised EPA/RREL of the necessity of finalizing the IAG on several occasions. It is anticipated that further communication stressing the importance of this agreement will be necessary.
2. Rocky Flats is currently pursuing the development of a purchase order to directly contract EER for the work necessary to meet this milestone. This will enable RFP to have a "fall back" position if such a position should be come necessary.

**Revised target date for milestone completion:**

There is currently no revised target date for the completion of this milestone.

**Agreement Milestone:** Compliance with Hazardous Air Pollutant Monitoring Requirements

**Due Date:** 3/15/93

**Driver:** EPA Order for Compliance (Clean Air Act)

**Reason for potential delay:**

Reports detailing RFP's compliance status were submitted to the EPA on December 18, 1992. The reports support RFP's compliance with the monitoring protocol of 40 CFR 61, Subpart H and request EPA concurrence. The RFP is awaiting concurrence by EPA. No further action is possible until a response has been received from the EPA.

**Have the regulators been advised:**

EPA Region VIII is aware that the compliance order is near the end of its term (3/15/93) and that RFP is awaiting EPA concurrence of RFP's "in-compliance" status or details of corrective action that RFP can take to achieve compliance before the deadline.

**Actions taken to address delays:**

RFP met with EPA Region VIII to discuss EPA's progress in reviewing the compliance assessment reports and to stress RFP's wishes for a quick response. RFP has offered to meet weekly with EPA to explain the reports in hopes of shortening the review process.

**Revised target date for milestone completion:**

The compliance order milestone can not be changed. EPA will either 1) concur with RFP's compliance assessment, in which case compliance would be achieved before the end of the compliance order term, or 2) EPA will indicate corrective activities required for compliance before the compliance order deadline or enter into a consent decree or FFCA with the DOE to allow more time to complete any stipulated corrective actions.

**Agreement Milestone:** Sewage Treatment Plant Facility Upgrades Phase 1 (Drying Beds Capacity Improvements)

**Due Date:** 3/1/93

**Driver:** Clean Water Act Requirements Established by EPA

**Reason for potential delay:**

The Facility Project Management (FPM), Project Manager reported that Phase I is still on schedule for completion on March 1, 1993. The concern is that all schedule contingency has been used and that the remaining schedule is extremely tight.

**Have the regulators been advised:**

DOE, RFO and the EPA were advised of the tight schedule in the recent Quarterly FFCA Progress Report.

**Actions taken to address delays:**

E&WM advised the FPM organization that this project has top priority status.

E&WM continues to meet with FPM on a weekly basis to ensure proper management attention is given to the project.

**Revised target date for milestone completion:**

N/A

**Agreement Milestone:** Implement Tank Surveillance Program

**Due Date:** 6/30/93

**Driver:** Clean Water Act Requirements Established by EPA

**Reason for potential delay:**

This milestone is on schedule as was inappropriately statused as (2) "Some Chance That Milestone Will be Missed."

**Have the regulators been advised:**

N/A

**Actions taken to address delays:**

N/A

**Revised target date for milestone completion:**

N/A

**Agreement Milestone:** OU-2 Draft Phase II RFI/RI Report

**Due Date:** 3/12/93

**Driver:** Federal Facility Agreement (CERCLA) with EPA and State of Colorado

**Reason for potential delay:**

The schedule has been impacted by longer than expected procurement schedules, additional program reviews and regulator review schedules. The lack of sufficient funds to cover bedrock activities in FY-92 has also impacted the schedule.

**Have the regulators been advised:**

Regulators have been informed.

**Actions taken to address delays:**

Extension has been requested.

**Revised target date for milestone completion:**

9/1/94

**Agreement Milestone:** OU-1 Submit Draft CMS/FS Report

**Due Date:** 3/31/93

**Driver:** Federal Facilities Agreement (CERCLA) with EPA and State of Colorado

**Reason for potential delay:**

The schedule has been delayed by a longer than expected procurement schedule, additional reviews and regulator review schedules.

**Have the regulators been advised:**

Regulators have been informed.

**Actions taken to address delays:**

An extension has been requested and received.

**Revised target date for milestone completion:**

6/29/93

**Agreement Milestone:** OU-4 Draft Phase I RFI/RI Report

**Due Date:** 5/21/93

**Driver:** Federal Facility Agreement (CERCLA) with EPA and State of Colorado

**Reason for potential delay:**

The assessment schedule is slipping for two reasons: (1) procurement and initiation of field work took longer than planned in the IAG; (2) the solar ponds have not been emptied thereby preventing drilling.

**Have the regulators been advised:**

Regulators have been advised.

**Actions taken to address delay:**

An extension has been requested.

**Revised target date for milestone completion:**

A request for extension to May 21, 1994 has been submitted.